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Attorney for Defendant
BRYAN PAUL TAMBLYN

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 2:20-cr-00014-KJM
)	
Plaintiff,)	STIPULATION FOR MODIFICATION OF
)	CONDITIONS OF PRETRIAL RELEASE TO
vs.)	REMOVE DRUG AND ALCOHOL TESTING;
)	PROPOSED ORDER
BRYAN PAUL TAMBLYN,)	
)	Hon. Jeremy D. Peterson
Defendant.)	
)	
)	

At the request of Pretrial Services, the defendant, BRYAN PAUL TAMBLYN, by and through his attorney of record, Assistant Federal Defender Megan T. Hopkins, and the UNITED STATES, by and through its attorney of record, Christina McCall, hereby stipulate to and request an order from this Court modifying the conditions of Mr. Tamblyn's pretrial release by removing Special Condition of Release Number Eleven (11), requiring that Mr. Tamblyn "submit to drug and/or alcohol testing as approved by the pretrial services officer ... [and] ... pay all or part of the costs of the testing services based upon [his] ability to pay, as determined by the pretrial services officer".

Mr. Tamblyn has been on pretrial release in this district since February 2020, on a \$50,000 unsecured appearance bond as well as an appearance bond secured by deeds of trust and co-signed by his uncle, Jerome Espinosa and grandfather, Richard Espinosa. *See* Dkt. 26 (unsecured appearance bond) and Dkt. 29 (appearance bond secured by deeds of trust). Additionally, Mr. Tamblyn has three (3) appointed third party custodians: Richard Espinosa, Sr.,

Jerome Espinosa, and Sheri Placencia. Mr. Tamblyn has remained in compliance with all of his conditions of release throughout his time on supervision.

Accordingly, the parties and pretrial services officer agree that the drug and alcohol testing condition is no longer necessary, and should be removed from Mr. Tamblyn's special conditions of release. The parties further agree and recommend that all other conditions remain in full force and effect. The proposed amended condition is attached to this request. The parties do not request a hearing in this matter in light of this stipulation.

Respectfully submitted,

DATED: March 4, 2022

HEATHER E. WILLIAMS

Federal Defender

/s/ Megan T. Hopkins

MEGAN T. HOPKINS

Assistant Federal Defender

Attorney for BRYAN PAUL TAMBLYN

DATED: March 4, 2022

PHILLIP A. TALBERT

United States Attorney

/s/ Christina McCall

CHRISTINA MCCALL


Assistant United States Attorney

Attorney for the United States

[PROPOSED] ORDER

GOOD CAUSE HAVING BEEN SHOWN, IT IS HEREBY ORDERED THAT Special Condition of Release Number Eleven (11) for defendant, Bryan Paul Tamblyn, be removed. All other conditions of pretrial release shall remain in force.

DATED: March 4, 2022


HON. JEREMY D. PETERSON
United States Magistrate Judge